

A

RG

**From:** Russell Greer russmark@gmail.com  
**Subject:** Re: Motion for Sanctions  
**Date:** January 30, 2025 at 6:24 AM  
**To:** Matt Hardin matthewdhardin@gmail.com

Matthew,

Let me try maybe putting yourself in my shoes because you're not doing that.

What if you had a friend, let's say his name is Frank, who had seen a bunch of shit being done to you and you talked with him and you said you needed him to potentially testify to these events, but he kept saying yes and then no, with some of it being he didn't want his name public. Would you just tell the judge that you have no witnesses or would you try listing him under seal?

That's my situation. I didn't want to say I had no witnesses because that simply wasn't true. I did. I have provided texts proving so. The conversations with Scott were via phone so that's obviously not a tangible evidence.

That's what has happened here. I testify to you that Nathan and Scott both said on different occasions that they would testify.

As for Steve Taylor, he was a former college advisor/friend who I had a falling out with and I decided not to list him. Him and I had very long talks about kiwi farms. I have that right to not have him listed.

And because they went from eager in May to not so eager in the fall, I didn't include the word eager and just said I had people who had witnessed.

You're doing a lot of looking on from the outside and accusing me of stuff without knowing any of the facts and the figurative wrestling I've had to do with the once proposed witnesses.

2. As for protective orders. Look at your 12-29-24 email, sir. You asked me what provision you violated. I was telling you the gist of the protective order said you would keep it secret. However, because you wanted to know the EXACT provision you violated, I had to request info on how to obtain that info.

This email reinforces why I didn't disclose anything to you because you do a lot of assuming.

I urge you to not file the motion for sanctions. That will only speed up my motion for sanctions against you and the motion for you to lose your pro hac vice status.

Again, we can bicker over these small things that you have chosen to jump up and down about or we can proceed past this.

Sent from my iPhone

Sent from my iPhone

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Sent from my iPhone

On Jan 30, 2025, at 1:57 AM, Russell Greer <russmark@gmail.com> wrote:

I will reply to this.

Thanks.

Sent from my iPhone

On Jan 29, 2025, at 7:03 PM, Matthew Hardin <matthewdhardin@gmail.com> wrote:

Mr. Greer:

Please see attached a Motion for Sanctions arising from your materially false statements to the Court. As required by Rule 11, I am serving this Motion on you via email but am not yet filing it with the Court. I demand that you withdraw the referenced pleadings containing false statements within 21 days, but I reserve all rights to seek appropriate relief, including in the form of an order requiring you pay additional attorney's fees. I will file the Motion with the Court on or about February 20.

Best,

<SanctionsGreerJan29.pdf>

**Matthew D. Hardin**

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